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11 *Attorneys for California Department of Transportation*

12 **UNITED STATES BANKRUPTCY COURT**
13 **NORTHERN DISTRICT OF CALIFORNIA**
14 **SAN FRANCISCO DIVISION**

15 In re:
16 PG&E CORPORATION

17 - and -

18 PACIFIC GAS AND ELECTRIC
COMPANY,

19 Debtors.

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

- | | |
|--|---|
| 20 <input type="checkbox"/> | Affects PG&E Corporation |
| 21 <input type="checkbox"/> | Affects Pacific Gas and
Electric Company |
| 22 <input checked="" type="checkbox"/> | Affects both Debtors |

23
24 **CALIFORNIA DEPARTMENT OF TRANSPORTATION'S NOTICE OF**
25 **WITHDRAWAL OF ITS OBJECTION TO SCHEDULE OF EXECUTORY**
26 **CONTRACTS AND UNEXPIRED LEASES TO BE ASSUMED [DOCKET NO. 7276]**
27
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1 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that, on May 1, 2020, PG&E Corporation and Pacific Gas and
3 Electric Company (collectively, the “**Debtors**”) filed the *Schedule of Executory Contracts and*
4 *Unexpired Leases to be Assumed Pursuant to the Plan and Proposed Cure Amounts* [Docket No.
5 7037], which listed certain agreements with, among others, the California Department of
6 Transportation (“**Caltrans**”) to be assumed pursuant to the Plan (the “**Caltrans Scheduled**
7 **Contracts**”) and the corresponding Cure Amounts (the “**Proposed Cure Amounts**”). In
8 addition, under the Plan, the Debtors assumed non-scheduled contracts with Caltrans
9 (collectively, with the Caltrans Scheduled Contracts, the “**Assumed Contracts**”). On May 15,
10 2021, Caltrans and other California agencies filed an objection to the Proposed Cure Amounts,
11 styled as *California State Agencies’ Objections to Schedule of Executory Contracts and*
12 *Unexpired Leases to be Assumed Pursuant to the Plan and Proposed Cure Amounts* [Docket No.
13 7276] (the “**Cure Dispute**”).

14 PLEASE TAKE FURTHER NOTICE that, on or about July 27, 2021, Caltrans and the
15 Debtors entered into a Settlement Agreement under which the Debtors made payments in full and
16 final satisfaction of cure amounts owed under the Assumed Contracts. Pursuant to the Settlement
17 Agreement, Caltrans withdraws the Cure Dispute with respect to the Assumed Contracts.
18 Nothing herein shall withdraw the Cure Dispute as to other state agencies. Caltrans’ withdrawal
19 from the Cure Dispute is without prejudice to the rights of other state agencies.

20 Dated: September 17, 2021

Respectfully submitted,

21 ROB BONTA
22 Attorney General of California
23 MATTHEW C. HEYN
Deputy Attorney General

24 FELDERSTEIN FITZGERALD
25 WILLOUGHBY PASCUZZI & RIOS LLP

26 By: /s/ Paul J. Pascuzzi
27 PAUL J. PASCUZZI, ESQ.
28 Attorneys for California Department of Transportation

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I am a resident of the State of California and over the age of eighteen years, and not a party to the within action; my business address is 500 Capitol Mall, Suite 2250, Sacramento, CA 95814. On September 17, 2021, I served the within documents:

By Electronic Service only via CM/ECF.

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